To: Federal Communications commission

Re: Comments on the NextNav, Inc. proposal
"Enabling Next-Generation Terrestrial Positioning, Navigation, and Timing and 5G: A Plan for the Lower 900 MHz Band (902-928 MHz"

Dear Commissioners,

I urge the FCC to reject this proposal from NextNav, Inc. I am a users of devices which use pats of this spectrum (remote cameras, ISM radios, sensor links in the 915 MHz ISM band) and an amateur radio operator involved in 920 MHz communications systems. Not only would this proposed system disrupt the current uses of this spectrum I have two significant issues with the content of the proposal document – the quality of the technical claims as well as the primary goal of the petitioner.

The document submitted is full of poorly sourced and inaccurate. If I had unlimited time I would check each and every source citation for the technical claims made in the proposal, but with only a few clicks I found a serious error in the discussion of GPS system accuracy.

On page 8 NextNav references an online document from GPS.gov to make the claim "*Today, GPS offers broad outdoor coverage,*[23] *supports a wide range of enabled devices, including smartphones, internet-of-things ("IoT") devices, and navigation equipment, and GPS.gov reports a typical accuracy of within 4.9 meters (x/y axis) "under open sky" conditions, but "their accuracy worsens near buildings, bridges, and trees.*[24]" However the GPS.gov link provided speaks only to the positioning accuracy on cell phones, and that statement on GPS.gov provides a link to the source document for this 4.9 meter claim and the qualification that it degrades near buildings and bridges. This source document makes no mention of degraded accuracy near bridges. It states "*In this lab, with over one thousand participants in one hundred countries, the measured mean accuracy, remarkably, came to 4.9 meters. Even more interesting, the accuracy in urban areas showed a remarkable correlation with building height.*"

First, the original document (found online) should have been cited, not a secondary source which paraphrases the original source; second, the accuracy of the technical information is called into question. The quality of the technical information claimed by the petitioner needs to be carefully vetted.

My review of this petition leads me to believe that the primary goal of the petitioner is to secure a large chunk of spectrum to build out a 5G wireless network. The need for low power uplinks and high power downlinks certainly describes a mobile wireless network more than it does a terrestrial PNT system.

I sincerely hope that the Commission rejects this proposal. As a user of low power devices using spectrum in the affected Lower 900 band I believe that I and millions of other Americans will be adversely affected by a build out of 1000 – 3000 watt transmitters in this already occupied spectrum.

Sincerely,
Greg Falxa
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